

IN THE UNITED STATES COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FILED

MAR 21 2013

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

GERMAINE J GRANT

Plaintiff.

Case No. 1:11-CV-5611

-v-

Hon. JUDGE John W Darrah

Reliable Recovery Services INC,

Santander Consumer usa inc

Notice of Motion

Please take Notice that a presentment of motion to dismiss Santander amended complaint the undersigned shall present this motion before honorable John darrah, or any judge sitting in his stead, in courtroom 1203 of the united states district court for northern district of Illinois, eastern division, located at 219 south Dearborn street, chicago, Illinois 6064, and then and there present the motion of plaintiff germaine grant to dismiss the complaint



GERMAINE J GRANT  
P.O. BOX 23  
JOLIET IL 60433

815 582-3518

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-v-

**Reliable Recovery Services INC,**

**Santander Consumer usa inc**

**Presentment to motion to file leave motion to dismiss Santander's amended counterclaim**

**and grant motion for judgment**

Counter Defendant / Plaintiff, Germaine Grant in his own behalf moves this court to request by the plaintiff presentment to file leave **Motion to dismiss the complaint** for defendants/ counter plaintiff's, Santander for his failure to abide by discovery process order previously issued by this court.. In support thereof Germaine Grant the live and living states as follows:

The defendant has prejudice the plaintiff complaint by holing information from the plaintiff and causing delays in the discovery process.

1. The defendant has cause this delays after having meeting and was warned by the plaintiff about the delays in which the defendant has cause.
2. The plaintiff discovery isn't complete at all because the defendant has block all process in do so.



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